

OFFICER'S CPNI COMPLIANCE CERTIFICATE

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2015 covering the prior calendar year 2014

1. Date filed: **February 24, 2015**
2. Name of company(s) covered by this certification: **Ultra Communications Group, LLC**
3. Form 499 Filer ID: **829833**
4. Name of signatory: **Ken Johnson**
5. Title of signatory: **Chief Technology Officer & Chief Information Officer**
6. Certification:

I, Ken Johnson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed _____

Ken Johnson, Chief Technology Officer & Chief Information Officer

Attachments: Accompanying Statement explaining CPNI procedures

Ultra Communications Group, LLC

Statement of CPNI Usage and Regulatory Compliance

Ultra Communications Group, LLC's written CPNI Operating Procedures ensure that Ultra Communications Group, LLC ("Ultra"), will be in compliance with 47 U.S.C. §222 and the rules contained in the Title 47, Chapter 1, Subchapter B, Part 64, Subpart U of the Code of Federal Regulations. Included among the provisions of Ultra's CPNI Operating Procedures are:

- A requirement that Ultra have at all times a CPNI Compliance Supervisor to supervise the implementation of Ultra CPNI Operating Procedures and that Ultra personnel must comply with its CPNI Operating Procedures.
- Provisions establishing a supervisory review process coordinated by the CPNI Compliance Supervisor regarding compliance with the Commission's CPNI rules for outbound marketing situations and maintenance of such records of compliance for a minimum period of one year.
- A requirement that sales personnel must obtain supervisory approval from the CPNI Compliance Supervisor and Director of Marketing for any proposed outbound marketing request for customer approval.
- Detailed procedures for safeguarding CPNI, including procedures for customer authentication.
- Detailed procedures for determining whether and what type of customer approval is necessary for use, disclosure or access to CPNI, for obtaining such approval where necessary, and for determining the status of a customer's CPNI approval prior to any action for which approval is necessary. Ultra does not market or sell CPNI to any third party.
- A requirement that the billing system records for customers' accounts allow the status of the customer's CPNI approval to be easily ascertained.
- A requirement that personnel be trained as to when they are and are not authorized to use CPNI.
- An express disciplinary process for misuse of CPNI and failure to comply with the Ultra CPNI Operating Procedures. Possible penalties include suspension and/or termination of employment when appropriate.
- Detailed filing, notice and recordkeeping requirements. Ultra maintains detailed procedures for maintaining a record of any sales and marketing campaigns that use customers' CPNI. Pursuant to those procedures, such records will be maintained for all instances where CPNI is disclosed or provided to third parties,

or where third parties are allowed access to CPNI, and will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Under those procedures, Ultra will retain the record for a minimum of one year.

- Detailed procedures for protecting CPNI from breach and to be followed in the event of a breach of CPNI.